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Executive Summary

Since the September 11, 2001 attacks by al Qaeda on the World Trade Center and Pentagon, the federal government has mobilized law enforcement agencies at all levels into a coordinated national defense against future terror attacks. To meet this challenge, the growing ranks of the domestic security apparatus—including local police, transit, port, and other agencies not traditionally involved in counterterrorism—require training. The George W. Bush administration's declaration of “war on terror” bolstered a private counterterrorism training industry that offers courses on topics ranging from infrastructure reinforcement to terrorist ideology.

A nine-month investigation by Political Research Associates (PRA) finds that government agencies responsible for domestic security have inadequate mechanisms to ensure quality and consistency in terrorism preparedness training provided by private vendors; public servants are regularly presented with misleading, inflammatory, and dangerous information about the nature of the terror threat through highly politicized seminars, industry conferences, trade publications, and electronic media. In place of sound skills training and intelligence briefings, a vocal and influential sub-group of the private counterterrorism training industry markets conspiracy theories about secret jihadi campaigns to replace the U.S. Constitution with Sharia law, and effectively impugns all of Islam—a world religion with 1.3 billion adherents—as inherently violent and even terroristic.

Walid Shoebat, a popular “ex-Muslim” speaker used by multiple private training firms, recently told the audience at an International Counter-Terrorism Officers Association (ICTOA) conference, “Islam is a revolution and is intent to destroy all other systems. They want to expand, like Nazism.”¹ Another private sector counterterrorism trainer, John Giduck, told a

Homeland Security Professionals Conference, “Going back to the time of Mohammed, Muslims’ goal has been to take over the world.”² Walid Phares, who teaches for The Centre for Counterintelligence and Security Studies and the National Defense University, argues that “jihadists within the West pose as civil rights advocates”³ and patiently recruit until “[a]lmost all mosques, educational centers, and socioeconomic institutions fall into their hands.”⁴ These “jihadists” put off militant action, Phares claims ominously, “until the ‘holy moment’ comes.”⁵ Solomon Bradman, CEO of the training firm Security Solutions International (SSI), likewise claims that a Muslim stealth jihad threatens the United States from within. Such assertions are far from benign. Asked by a PRA investigator what she understood to be Shoebat’s solution to the Islamic threat he described at the ICTOA event previously mentioned, one audience member responded, “Kill them, including the children. You heard him.”⁶

Islamophobic statements like those above have the effect of demonizing the entirety of Islam as dangerous and “extremist,” denying the existence of a moderate Muslim majority, or regarding Islam generally as a problem for the world.⁷ The private sector speakers and trainers PRA investigated routinely invoke conspiracy theories that draw upon deeply-ingrained negative stereotypes of Muslim duplicity, repression, backwardness, and evil.⁸ Islamophobia is “an outlook or world-view involving an unfounded dread and dislike of Muslims, which results in practices of exclusion and discrimination” and may include the perception that Islam is inferior to the West and is a violent political ideology rather than a religion.⁹

The notion that a generalized Muslim menace poses an existential threat to the United States and

western democracy contradicts official national security doctrine and undermines both domestic security and the constitutional rights of our citizens and residents. Nonetheless, PRA's investigation finds that public resources are being used to propagate this dangerous falsehood to the nation's first responders, intelligence analysts, and other public servants.

The Department of Homeland Security (DHS) has primary federal responsibility for providing counterterrorism training to federal, state, and local emergency responders. DHS has developed a menu of government terrorism readiness and prevention courses designed to give first responders the analytical and practical skills to enhance community safety. However, a significant share of such training appears to be provided by private firms not vetted by government experts. DHS maintains a list of peer-reviewed private courses eligible for use with grant funds administered by the National Training and Education Center (NTED), a sub-division of the DHS' Federal Emergency Management Agency (FEMA). This quality control mechanism is an exception to the rule; agencies can apply for a wide array of federal grant programs, often without notifying local government officials about how grant funds are used.¹⁰ Recipients of such funds may contract with private training firms of their choice and are often not required to report so much as the names of companies used to train their personnel.¹¹ The resources available to underwrite private, unregulated, training firms are substantial. Two grant programs that support training programs—the State Homeland Security Program (SHSP) and Urban Areas Security Initiative (UASI)—made \$1.67 billion available to states in 2010.¹² In addition to widespread quality control and transparency shortcomings of federal and other government programs, our investigation revealed examples of actual or perceived conflicts of interest, including the use of DHS and other public agency logos to promote private training events that were disavowed by those very agencies.¹³

PRA's investigation into counterterrorism training for public servants focused on three organizations and, where relevant, their affiliated trainers/faculty. This report describes both the qualitative differences among their approaches and some basic commonalities. All of these entities benefit from taxpayer dollars that underwrite the attendance of government employees at the events and seminars described herein:

International Counter-Terrorism Officers Association (ICTOA), a nonprofit corporation founded by New York Police Department personnel, provides a variety of speakers with a platform to address a cross section of law enforcement officials.

Security Solutions International, LLC (SSI) is a Florida-based privately held company. SSI claims to have provided training to over one thousand agencies and companies and produces *The Counter Terrorist* magazine.¹⁴

The Centre for Counterintelligence and Security Studies (CI Centre), a for-profit company launched by a former national security officer, functions as a training academy and speakers bureau in the D.C. beltway. Here, veteran Cold Warriors mingle with academics, a self-described Muslim reformer, and a convert from Islam, and deliver a course on the "Global Jihadist Threat Doctrine." According to CI Centre, they train "approximately 8,000 students per year," the majority of whom are "current employees of the U.S. national security community."¹⁵

Each of these organizations occupies a different niche in the counterterrorism training industry. Although different from each other in many regards, all three groups, or their affiliated trainers and spokespeople, propagate dangerous Islamophobic themes and stories to personnel charged with public safety and national security. By presenting themselves as law enforcement and intelligence specialists, these organizations and spokespeople lend their credentials to religious bigotry. The problem of private sector provision of Islamophobic training to public servants is not limited to these three groups. Additional research, including vigilance on the part of federal and local government agencies, is needed in order to define and address its full dimensions.

MANUFACTURING THE MUSLIM MENACE: FIVE FRAMES

PRA's research has identified five important frames which are often utilized by trainers to deliver an Islamophobic message to those undergoing training in counterterrorism, and some or all of which are utilized by individuals associated with the

three organizations studied who are responsible for the training:

1. *Islam is a Terrorist Religion*

Islamophobic counterterrorism training often brands Islam as the enemy in the “war on terror.” Private security groups and their speakers define the threat using ideological and theological terms that link Islam inextricably to terrorism. Within this frame, the problem is not simply terrorists who are Muslim but an “evil” Islam itself. ICTOA guest speaker Walid Shoebat, a self-described “former Islamic terrorist” and convert to an apocalyptic form of Christianity, suggests Islam is the fake religion of the “anti-Christ” and implies that Muslims bear the “Mark of the Beast.”¹⁶ He describes Islam and Muslims as inherently violent and savage, recounting an endless litany of violent acts committed by individuals in a manner that implies an irredeemably violent culture.¹⁷

2. *An Islamic “Fifth Column,” or “Stealth Jihad,” is Subverting the U.S. from Within*

This frame posits an existential threat to the United States even greater than that posed by al Qaeda: The domestic rise of political Islam aims to transform the United States into a Muslim country ruled by Sharia law.¹⁸ The argument is supported by a conspiracy theory in which Muslim-American advocacy groups act as front organizations for foreign Islamists, such as the Egyptian Muslim Brotherhood. Another version substitutes the puritanical religious movements Wahhabism or Salafism as the foreign puppetmaster. The argument encourages law enforcement to focus on alleged front organizations, chilling the exercise of constitutional freedoms and potentially diverting attention from illegal, terrorist activity. The theme resurrects McCarthy-era anti-Communist counter-subversion doctrine, substituting a current Muslim menace for the former Communist one, and justifying once-discredited witch-hunting practices.

3. *“Mainstream” Muslim Americans Have Terrorist Ties*

Islamophobic counterterrorism trainers routinely categorize such civil rights groups as the Muslim Public Affairs Council (MPAC), Islamic Society of North America (ISNA), and Council on American-Islamic Relations (CAIR) as a support network for terrorists. For this charge they lean heavily on guilt by association, citing a few instances of members or former members with troublesome associations as evidence of organizational complicity. In spite of

extensive and ongoing scrutiny, none of these organizations have ever been convicted of terrorism or formally charged with providing material support to terrorists. Islamophobic story lines characterize the widespread support for Palestinian statehood and opposition to the continuing Israeli occupation of Palestinian lands among Muslim-American leaders as evidence of sympathy for terrorism.

4. *Muslim Americans Wage “Lawfare”: Violent Jihad by Other Means*

The “lawfare” frame holds that Muslim extremists use litigation, free speech, and other legal means to advance a subversive agenda and silence opponents — using democracy to subvert democracy. “Lawfare” utilizes a kind of Orwellian double-speak in which “terrorism” is not the use of terror, but the use of legal procedures. Law becomes warfare when used to oppose Islamophobia or assert Muslim-Americans’ civil rights. According to The Lawfare Project, a group led by one-time SSI guest speaker Brooke Goldstein, the term denotes “the abuse of the law and judicial systems to achieve strategic military or political ends.” Some of the trainers profiled in this Report use the lawfare charge to recast Muslim Americans’ claims that their rights are being violated as crafty tactics to keep their subversive agenda hidden from the public.

5. *Muslims Seek to Replace the U.S. Constitution with Islamic, Sharia, Law*

This frame raises the specter of a repressive Islamic Caliphate ruling over America and suggests that support for Sharia, rather than kinetic violent terrorism, is the “the most dangerous threat.”¹⁹ Like the Islamic “Fifth Column” conspiracy theory, this Sharia one evokes Cold War fears of global Communism. The menace of a global Islamic dictatorship stands in for the former Soviet one. Sharia is a set of ideals that define a properly constituted Islamic existence. Selective interpretations of Islamic jurisprudence are used by some terrorists to mobilize recruits with the ultimate goal of establishing a global Islamic government, or Caliphate. This frame is used to stigmatize civil rights advocates who fight religious discrimination by vilifying religious accommodation as capitulation to Islamic rule. No such process is actually underway. Further, the demonization of Sharia ignores the ongoing domestic transformation and accommodation of Islam to American legal, cultural, social, and economic norms.

Manufacturing the Muslim Menace

These five frames and the stories told to illustrate and support them rely on factual inaccuracies (or, at the very best, highly controversial interpretations of empirical data), as well as on the attribution of behaviors or beliefs evinced by some members of a religious group to most or all members of that group. Beyond such inaccuracies and distortions, the overwhelming focus on alleged religious motivations of terrorists by the groups and trainers we investigated belies an additional troubling bias. Empirical studies of counterterrorism by experts like Robert Pape, Mark Juergensmeyer, Marc Sageman, and others demonstrate that across religions—and not just Islam—the majority of terrorists and suicide bombers are primarily driven by political grievances. Religion is most often used to recruit, legitimate, and motivate.

THREATS TO SECURITY AND RIGHTS

To the extent that Islamophobic counterterrorism training is successful in influencing the behavior of law enforcement and domestic security personnel, the biased themes and stories described in the preceding section are likely to undermine both domestic security and constitutional rights. Probable outcomes include confrontational or otherwise non-cooperative relations between police and local Muslim and Arab communities. Safety is sacrificed if community members become less likely to report crimes or access public services, such as healthcare or emergency services, out of fear that they will be mistreated or subject to arbitrary, intrusive questioning.

The Islamophobic messages conveyed by biased and ideologically rigid trainers associated with the three groups examined in this report risk fostering resistance to the integration of Muslims into the fabric of American society. They often treat public expressions of devout, fundamentalist, or “pure” Islam as evidence of belief in a theology that supports terrorism. If adopted by law enforcement, the ideological, Islamophobic approach of these trainers and firms is likely to yield a number of unconstitutional and otherwise negative outcomes:

Biased Intelligence Analysis

The false and damaging equation of Islam with terrorism could taint intelligence analysis by grossly distorting and exaggerating the threat factor and targeting innocent activity.²⁰ Cultural and personal bias and outright politicization can lead intelligence

units to collect data on the wrong targets and increase the probability of analytical failure by analysts who lack the benefit of evidence-based training.²¹

Stereotyping and Profiling

Indoctrinating police officers and intelligence personnel to distrust the motives of Muslim Americans is a recipe for racial, ethnic, and religious discrimination and unconstitutional profiling. Islamophobic training content encourages officers and analysts to rely on religious speech as a proxy for evidence of criminal intent. Conspiracy theories about “stealth jihad” encourage employment discrimination against Muslims in public service occupations. Feedback from participants in trainings on the “Jihadist Threat” suggests increased suspicion of potential recruits and Muslim colleagues.

Unlawful Searches and Illegal Surveillance

Messages that render suspect certain religious beliefs (such as support for Sharia law), expressions of political sympathy for Palestinians’ cause, or association with legal advocacy groups may spur indefinite surveillance of innocent persons and houses of worship without a criminal predicate. Warrantless surveillance chills political participation in civil society and strikes at the heart of the First Amendment’s guarantee of freedom from religious persecution. Islamophobic messages vilifying legal advocacy basically endorse political spying and disruption.

Physical Violence and Hate Crimes

The religious and racial prejudice that could result from biased Islamophobic training potentially could lead to deadly responses, such as police officers being more likely to shoot in an ambiguous situation. It might also result in more assaults against people identified rightly or wrongly as Muslim or Arab. Propagation of the “Lawfare” myth may cause law enforcement executives or officers to doubt and under-investigate complaints of hate crimes or civil rights violations from members of Muslim, Arab, Middle Eastern, and South Asian communities.

Chilling Free Speech

Speakers associated with the CI Centre and Security Solutions International characterize public criticism of Islamophobia as “lawfare,” or, as CI Centre faculty member Clare Lopez puts it, the “offensive use of democratic legal systems by those whose intent is to destroy democracy.”²² The lawfare frame represents a

dangerous nadir in the conflation of free speech and terrorism, wherein terrorism is transformed from indiscriminate violence against civilians to filing a lawsuit. This not-so-subtle slight of hand stigmatizes opponents of anti-Muslim training, tarring them as the moral equivalent of terrorists in order to silence dissent.

RECOMMENDATIONS*

The federal government has a particular responsibility to ensure that the analytical and skills training delivered to public servants is accurate, consistent, in accordance with national security policy, and respectful of constitutional rights. Based on the findings of this investigation, Political Research Associates calls upon Congress, the Department of Homeland Security, and the Department of Justice to:

1. Investigate Existing Programs to Ensure That Counterterrorism Trainings are Accurate and Free from Bias.

Congress should ask the Government Accountability Office (GAO) to undertake an evaluation of all private vendors that provide counterterrorism training to federal, state, or local agencies, including through conferences, seminars, and courses. The GAO should consult with experts identified by the Departments of State, Defense, Justice, and Homeland Security to identify any inaccuracies, religious/racial/ethnic bias, or contradiction of national counterterrorism policies. U.S. Attorney General Eric Holder, DHS Secretary Janet Napolitano, and appropriate Congressional oversight committees in both branches should investigate whether all federally sponsored counterterrorism training programs, seminars, and conferences utilize experts whose messages are accurate and free from bias. The problem of Islamophobia in counterterrorism training must be acknowledged and addressed by government agencies at the federal, state, and local level. Additional research is needed to ascertain the level of anti-Muslim sentiment in both law enforcement and the domestic security bureaucracy.

2. Substitute Private Counterterrorism Training of Public Employees with Government Programs.

The privatization of core intelligence activities reduces public accountability, oversight, and control. Federal agencies should incentivize and prioritize government-sponsored trainings, and phase-out reliance on private counterterrorism training for public servants.

3. Establish Standards For Private Counterterrorism Training Firms and Experts.

To the extent that private contractors and firms offer expertise not available from government sources, the DHS and DOJ should establish standards to certify anti-terror training course providers. These standards should prohibit religious discrimination and emphasize respect for civil liberties. Groups or speakers who do not meet these guidelines should not be invited to address public servants, and should be ineligible for public funding.

4. Improve Reporting of Federal Funding for Counterterrorism Training

The Office for Grants and Training (G&T) is the principle DHS agency providing counterterrorism and WMD training to states and localities, through both DHS training institutions and partners. Congress should direct G&T to assume responsibility for tracking all federal counterterrorism training, including the training FEMA provides to first responders. All federal expenditures for counterterrorism training—whether through grantees, sub-grantees, or federal agency budgets allocations—should be reported and available to the public.

5. Work with (Rather than Vilify) American Muslim Community Organizations.

In evaluating existing training opportunities and setting standards for trainers and courses, investigators should be alert for programs that appear to single out Muslim Americans or their constituency groups and community institutions. “Radical Islam Tests” should never be used as a prerequisite for cooperating with any Muslim, Arab, or Middle Eastern groups; such exercises presume guilt and are based on unacceptable stereotypes. DHS and DOJ should support training that fosters community-oriented policing efforts based on respect and parity between parties. Enhancing channels of communication should not, however, serve as a pretense for intelligence gathering.

6. Improve the Cultural Competency and Religious Understanding of Intelligence and Law Enforcement Personnel.

The DOS and DOJ should develop and support training courses that promote an understanding of a wide variety of religious practices and faith traditions in order to root out the Islamophobia identified in this Report. PRA supports baseline counterterrorism training that includes, as part of its curriculum, awareness of indicators for violent ter-

* Full Recommendations on p. 52

rorism based on a variety of ideological or religious sources. However, prior to teaching about Islamic-inspired terrorists' ideological motivations, training courses should foster a basic understanding of Islam and Muslims. Such training should not be mere window dressing. They should aim to substantially correct harmful misconceptions about Islam and Muslims.

7. Congress Should Enact Legislation to Prohibit Racial, Ethnic, and Religious Profiling. The End Racial Profiling Act (ERPA) is necessary to protect the rights of Arabs, Muslims, Middle Easterners, and South Asians—those communities most harmed by Islamophobic counterterrorism training—and counteract the impression that Muslims are not full citizens entitled to protection under the United States Constitution.

OUR SOURCES

¹ Walid Shoebat, Speech delivered at International Counter-Terrorism Officers Association, 8th Annual Conference, Las Vegas, October 20, 2010.

² John Giduck, Speech delivered at 5th Annual Homeland Security Professionals Conference, Las Vegas, Nevada (Oct. 26, 2010). As reported by PRA Investigator.

³ Walid Phares, *Future Jihad: Terrorist Strategies Against the West* (New York: MacMillan, 2005), 146.

⁴ Phares, *Future Jihad*, 143.

⁵ Phares, *Future Jihad*, 147.

⁶ Supporters of Shoebat have challenged our characterization of Shoebat's remarks at the 2010 ICTOA training; and even the veracity of our sources.

⁷ The Runnymede Trust's influential 1997 report identified eight main features of anti-Muslim prejudice:

- 1) Islam seen as a single monolithic bloc, static and unresponsive to new realities,
- 2) Islam seen as separate and other,
- 3) Islam seen as inferior to the West – barbaric, irrational, primitive, sexist,
- 4) Islam seen as violent aggressive, threatening, supportive of terrorism, engaged in 'a clash of civilizations',
- 5) Islam seen as a political ideology, used for political or military advantage,
- 6) criticisms made by Islam of 'the West' rejected out of hand,
- 7) hostility toward Islam used to justify discriminatory practices towards Muslims and exclusion of Muslims from mainstream society, and
- 8) anti-Muslim hostility accepted as natural and 'normal.'

⁸ See Peter Gottschalk and Gabriel Greenberg, *Islamophobia: Making Muslims the Enemy* (New York: Rowman & Littlefield, 2008), 77.

⁹ *Encyclopedia of Race and Ethnic Studies* (Routledge: 2003), 218. "The Runnymede Trust has been successful in that the term Islamophobia is now widely recognized and used, though many right-wing commentators either reject its existence or argue that it is justified." See also Runnymede Trust, *Islamophobia: A Challenge for Us All* (1997), p. 5, cited in Muzammil Quraishi, *Muslims and Crime: A Comparative Study* (Ashgate Publishing, Ltd.: 2005), 60.

¹⁰ Shawn Reese, *Federal Counter Terrorism Training: Issues for Congressional Oversight* (Washington, DC: Congressional Research Services Report for Congress, August, 2006), 1; See Center for Investigative Reporting for in-depth tracking of taxpayer money spent on homeland security.

¹¹ Letter from Dr. Anthony Bennett, Disclosure Branch Chief, Records Management Division, Mission Support Bureau, FEMA to PRA, dated Jan 28, 2011:

The Homeland Security Grant Program (HSGP) funds are awarded to State Administrative Agencies or local and county governments which, in turn, sub-grant or award funds to sub-recipient vendors. The entities under this request [such as CCI, CI Centre, FFMU, ICTOA] would have been awarded as sub-recipients of an HSGP award. FEMA does not maintain information on sub-recipients or vendors. You may contact State and local governments to carry out this request.

¹² Congress approved \$842 million for SHSP grants and \$832.5 million for USAI grants for 2010. These programs fund are dedicated towards law enforcement terrorism-prevention oriented planning, organization, training, exercise and equipment activities. U.S. Department of Homeland Security, *FY 2010 Preparedness Grant Programs Overview* (Dec. 8, 2009).

¹³ Bilal Kaleem, Muslim American Society, electronic correspondence to Thomas Cincotta (March 29, 2010). The Federal Bureau of Investigation staffed a table inside the speaker's hall at the October, 2010 International Counter-Terrorism Officers Association conference where conference speakers equated Islam with Nazism.

¹⁴ Security Solutions International, "SSI Clients." <http://www.homelandsecurityssi.com/ssi/content/view/71/87/>

¹⁵ Statement of David G. Major, President, The Centre for Counterintelligence and Security Studies (CI Centre) Before the U.S. House of Representatives, Committee on the Judiciary Subcommittee on Crime, Terrorism, and Homeland Security, "Enforcement of Federal Espionage Laws" Hearing January 29, 2008. <http://www.docstoc.com/docs/5791255/Statement-of-David-G-Major>

¹⁶ "Walid Shoebat—Mark of the Beast," Yarvevi Channel, *YouTube* (April 29, 2008). <http://www.youtube.com/watch?v=GtquNNEO7Fw>

¹⁷ Walid Shoebat, Presentation at ICTOA's 8th annual conference (October 20, 2010). Reported by PRA Investigator.

¹⁸ See Center for Security Policy, *Shariah: the Threat to America* (Oct. 2010), p. 24.

¹⁹ Center for Security Policy, *Shariah: the Threat to America* (Oct. 2010), p. 24. "Yet, al Qaeda and other Islamist groups who perpetrate terrorist acts are not the most dangerous threat. These threats, regardless of their brutality, cannot bring America to submit to shariah – at least were they to act alone. While the terrorists can and will inflict great pain on the nation, the ultimate goal of shariah-adherent Islam cannot be achieved by these groups

solely through acts of terrorism, without a more subtle, well-organized component operating in tandem with the.” The co-authors of this report include Clare M. Lopez and Stephen Coughlin. See www.shariatthreat.com

²⁰ The Department of Homeland Security has already implicitly acknowledged this problem. In 2009, the DHS Office of Civil Rights and Civil Liberties (CRCL) felt compelled to re-train authors of inappropriate and flawed intelligence reports that unfairly targeted non-violent advocacy groups. DHS sent officials to conduct remedial training after the North Texas Fusion Center released an intelligence bulletin that warned that freedom of speech was being exploited by Islamic groups to advance their Islamic-based goals. See David Gersten, Acting Deputy Officer for Programs and Compliance, Office for Civil Rights and Civil Liberties, U.S. Department of Homeland Security, Speech delivered at Islamic Society of Boston Cultural Center, Roxbury, Massachusetts (March 25, 2010). For example, in 2007 DHS intelligence analysts conducted an eight-month study of the Nation of Islam, even though they later admitted the organization neither advocated nor engaged in violence. Spencer S. Hsu and Carrie Johnson, “Documents show DHS improperly spied on Nation of Islam in 2007,” *Washington Post* (Dec. 17, 2009) <http://www.washingtonpost.com/wp-dyn/content/article/2009/12/16/AR2009121604096.html> A DHS analyst at a Wisconsin fusion center prepared a report about protesters on both sides of the abortion debate, despite the fact that no violence was expected at the protest. <http://www.cnsnews.com/news/article/61104> A number of similarly faulty reports were produced at DHS-funded fusion centers. American Civil Liberties Union of Texas, *ACLU of Texas Tours North Texas Fusion Center* (Oct. 9, 2009) <http://www.aclutx.org/projects/article.php?aid=785&cid=21>

²¹ The *Washington Post* recently reported that local police departments and fusion centers are hiring their own trainers to develop terrorism expertise, including Walid Shoebat and other “self-described experts whose extremist views are considered inaccurate and harmful by the FBI and others in the intelligence community.” Dana Priest and William M. Arkin, “Monitoring America,” *Washington Post* (Dec. 20, 2010), stating that the Center for Security Policy, Frank Gaffney, Walid Shoebat, and Ramon Montijo have each provided training to law enforcement or published views that about Islam that are considered “inaccurate and counterproductive” by government terrorism experts.

²² Clare M. Lopez, “SEALs Case Shows How Terrorists Use ‘Lawfare’ to Undermine U.S.,” *Human Events* (Mar. 8, 2010). “When frivolous lawsuits are brought against those who speak against Islamic jihad in an attempt to close down criticism of Islam altogether, that is lawfare. When the Organization of Islamic Conference sponsors a resolution that urges criminalization of any free speech that criticizes Islam, that is intended lawfare. When a Western government puts its own citizen on trial for “hate speech” against Islam, as is happening right now in the Netherlands with the courageous and very popular Freedom Party leader, Geert Wilders, that is lawfare.”